

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

HEATHER AKOU, *et al.*, )  
Plaintiffs, )  
v. ) No. 1:24-cv-1469-RLY-MJD  
THE TRUSTEES OF INDIANA )  
UNIVERSITY, *et al.*, )  
Defendants. )

**Renewed Motion for Preliminary Injunction**

The plaintiffs, by their counsel, renew their motion for a preliminary injunction and request that so much of the defendants' amended Expressive Activity policy be enjoined that prohibits the following activities on Indiana University property if they occur without prior permission between the hours of 11:00 p.m. and 6:00 a.m.: protesting, making speeches, circulating petitions, and all otherwise unapproved conduct and activities otherwise prohibited. In support of this motion, they say that:

1. The challenged portions of the amended policy are unconstitutional as violating the First Amendment.
2. In the absence of a preliminary injunction the plaintiffs are suffering irreparable harm for which there is no adequate remedy at law.
3. This harm outweighs any harm that an injunction would cause the defendants.
4. The public interest will not be disserved by the grant of a preliminary injunction.

5. The injunction should issue with bond as the injunction will not expose the defendants to the risk of any financial harm.

6. The plaintiffs intend to separately submit documentary or other evidence in support of this request along with their memorandum in support of this motion. Plaintiffs will submit their memorandum of law in support of this motion within the time established in any briefing schedule set by the Court. That to-be-filed memorandum is incorporated herein by reference.

7. The plaintiffs have proposed a schedule for discovery and briefing of the preliminary injunction issue and anticipate working with defendants' counsel to present a proposed schedule to the Court.

WHERFORE, plaintiffs request that this Court issue a preliminary injunction enjoining the defendants from enforcing so much of the amended Expressive Activity policy that prohibits the following activities on Indiana University property if they occur without prior permission between the hours of 11:00 p.m. and 6:00 a.m.: protesting, making speeches, circulating petitions, and all otherwise unapproved conduct and activities otherwise prohibited, and further the plaintiffs request all other proper relief.

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